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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., and HENDRINA
VIVAS CASTILLO,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 25-cv-1766

**DECLARATION OF MARIELA
GONZALEZ HERRERA IN SUPPORT OF
PLAINTIFFS' MOTION TO POSTPONE
EFFECTIVE DATE OF AGENCY ACTION**

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DECLARATION OF CECILIA DANIELA GONZÁLEZ HERRERA

I, Cecilia Daniela González Herrera, declare:

1. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could do so and would testify to these facts.

2. I have lived in the United States since 2017. I was 18 years old when I arrived with my family. I am now almost 26 years old, and I have lived my entire adult life in the United States. I first applied for Temporary Protected Status (TPS) in 2021. I rely on TPS for protection from deportation and lawful status in the United States while my family's asylum application remains pending, as it has been for nearly eight years.

3. I am submitting this declaration to describe the harm I have suffered since the announcement of the termination of the extension TPS for Venezuela and the harm my family and I would suffer if TPS is ultimately terminated.

Background

4. I grew up in Barinas, Venezuela with my mother, father and brother. After I graduated, I went to Caracas to study journalism. I joined the student movement against the Maduro regime. My mom told me not to join because she was afraid of what could happen to me, but I did anyway because the injustice created by the Maduro regime was too horrific to ignore.

5. I worked as the communications director for the student movement, documenting and posting about the student protests. Over time, the government became increasingly violent and aggressive towards the protesters. I remember one protest where we were surrounded by paramilitary forces on motorcycles pointing guns at the protestors. I remember thinking, "they have guns, but we only have signs." My mom had forbidden me from going to the protest, but she saw me on the news and got really mad at me. That year, I went home for spring break, and my parents told me that we had to leave Venezuela. My parents were also facing threats and harassment due to their political opinions and my father's legal work.

6. We came to the United States in July 2017, and settled in Central Florida,

1 where my parents had some friends. My father applied for asylum, and I was included in
2 his application as a derivative. However, almost eight years later, that application remains
3 pending.

4 7. At first, I felt directionless in the United States, but that changed in 2018,
5 when I joined Casa Venezuela, a cultural organization for the Venezuelan community in
6 the United States. The first event I attended was a public speaking workshop. I met the
7 founder, William Diaz, who became a mentor of mine. I started becoming involved
8 politically and with the Venezuelan community in Florida. I also became involved in the
9 advocacy effort to get Venezuela designated for TPS.

10 8. In 2021, I helped found the Venezuelan American Caucus, which is a
11 grassroots organization dedicated to advocating for policies that address the needs of
12 Venezuelans in the United States and in Venezuela. We needed TPS due to the broken
13 U.S. immigration system, and because there was a need for protection from removal to
14 Venezuela. Venezuela is currently facing a severe economic, political, and humanitarian
15 crisis. Millions of Venezuelans have left the country due to political persecution, a collapse
16 of basic services, food insecurity, and rampant violence. We understood that TPS does not
17 provide permanent solutions, but there were no other options for the many thousands of
18 Venezuelans who had fled the economic and political breakdown in Venezuela, and TPS
19 was an essential, immediate solution.

20 9. In addition to this advocacy, I also attend university and work. I am currently
21 the voting rights advocacy coordinator at a national civil rights organization, working hard
22 to ensure that every eligible voter has fair access to the ballot box.

23 **Impact of TPS**

24 10. TPS has given me stability and an opportunity to pursue my education. I am
25 studying at the University of Central Florida, with a major in political science and a minor
26 in Latin American studies. TPS allowed me to get my education, as I would be unable to
27 afford to go to university paying out-of-state tuition, and I am allowed to pay in-state
28 tuition only due to my TPS. Out-of-state tuition is three times the cost, which would have

1 been prohibitively expensive for me. I was also eligible for scholarships that are open to
2 TPS and DACA recipients. If TPS expires, I would likely have to abandon my studies,
3 which would impact my work, my career, and my future.

4 11. When I was granted TPS, it gave me a sense of comfort and relief. While I
5 knew that my family has an asylum application pending, I always knew that the outcome
6 of that application was uncertain. TPS also gave me a sense of belonging; I felt I had found
7 a home within the Venezuelan TPS community and could breathe better because I knew
8 that I was protected from deportation. It gave me a chance to plan for the future in a way I
9 never could before I had TPS.

10 **Impact of the Decision to Vacate TPS Extension**

11 12. When I heard that the January TPS extension was revoked, I was in disbelief.
12 I cried a lot during the three days between the announcement and when the decision was
13 published. I cried for myself, for my family, and for the many friends that I have that rely
14 on TPS for their survival. It was the first time that I had to really confront the possibility
15 that I would lose status in the United States and face deportation. It was like having the
16 ground disappear beneath my feet.

17 13. Earlier this month, I went to visit my friend, who is a permanent resident, to
18 watch the Grammy's with him and his mother. His mother has TPS from the 2023
19 designation, and so is expected to lose her legal status on April 7. While I was there, she
20 was packing and giving away clothes because she thinks she will have to leave the country
21 in a couple of months. That broke me, and I had to take the day off work the next day.

22 14. I now feel scared when I go outside. My mental health has suffered a lot. It
23 affected my schoolwork, because I started thinking, "what's the point?" What is the point
24 of studying if I am not going to be able to finish my degree?

25 15. I have canceled my plans of looking into graduate school programs, and
26 potentially applying to a masters degree program due to the uncertainty that comes with
27 this administration's decision to terminate TPS for Venezuela.

28 16. It is exhausting to live with such uncertainty. My brain is constantly worried

1 about my future, and at the same time, I am also on edge in my day to day activities. For
2 example, I now get very nervous while driving, terrified that I might be racially profiled,
3 pulled over, and turned over to ICE by local law enforcement. For the first time in eight
4 years, I am afraid to speak Spanish in public. I am so proud of my heritage and my
5 language, but now I feel afraid to speak it. These were not fears that I had until the TPS
6 extension was revoked.

7 17. If I lose my TPS status, I would be terrified to return to Venezuela. I am
8 afraid of facing violence or harm from the government. Apart from my fear of persecution,
9 I would have nowhere to go. I have no family left there, and no home. I do not know how I
10 would survive. I feel a sense of panic when I think about the possibility of returning to
11 Venezuela.

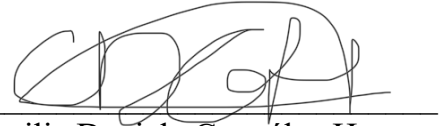
12 18. It is so hard to hear politicians talk about Venezuelans as criminals,
13 “dirtbags,” and Tren de Aragua members. They couldn’t be more wrong about the
14 Venezuelan TPS community. I couldn’t be farther from the Tren de Aragua. I now feel
15 unwanted in a country that, until now, felt like my home and my future. Now, everything is
16 uncertain.

17 19. I am trying to find ways to move forward, and for me, that has been
18 continuing advocating for my community. I find comfort knowing that my skills and
19 passion can help the bigger cause, through grassroot advocacy and even legislative
20 advocacy. With the Venezuelan American Caucus, we are collecting letters and signatures
21 to pressure Congress members to ask Secretary Noem to reconsider the decision to revoke
22 TPS for Venezuela. This month, I traveled to Washington, D.C., visiting Congressional
23 offices to hand deliver the letters, a fact sheet, and a call for action. I visited 52 offices on
24 the Senate side, 48 offices on the House of Representatives side, and attended meetings
25 with legislative staff to advocate for TPS for Venezuela.

26 20. I am also a member of the National TPS Alliance. I joined voluntarily,
27 because I believe in the NTPSA’s mission of defending the TPS program. I have talked
28 with José Palma, Co-Coordinator of the NTPSA, about defending TPS for Venezuela, and

1 have plans to participate in upcoming advocacy efforts.

2 21. I declare under penalty of perjury that the foregoing is true and correct, and
3 that this declaration was executed at Pasadena, California this 19th day of February, 2025.

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6 Cecilia Daniela González Herrera
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